

**REMARKS**

Claims 19-24 and 26-43 are all the pending claims, with claims 19 and 37 being written in independent form.

**I. Title:**

The Examiner objects to the title for not being descriptive of the claimed invention. As a path of least resistance, Applicants amend the title as suggested by the Examiner.

**II. Abstract:**

The Examiner objects to the Abstract of the Disclosure because it is not drawn to an apparatus. Applicants disagree because the Abstract presently on file is in fact directed to an apparatus. Notwithstanding, Applicants submit a replacement Abstract of the Disclosure (typed on a separate sheet) that is believed to be more clearly drawn to the claimed invention.

**III. Allowable Subject Matter:**

At numbered paragraph 7 of the Office Action, the Examiner indicates that claims 32-36 would be allowable if they were rewritten in independent form. Applicants do not, however, rewrite these claims because independent claim 19 is believed to be patentable for the reasons discussed in detail below.

#### **IV. Claim Rejection on Prior Art Grounds:**

The Examiner rejects claims 19-24 and 37-43 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,706,379 to Seno et al. (“Seno”). Applicants respectfully traverse this rejection in view of the following remarks.

Independent claims 19 and 37, as amended, recited (among other things) that the head is “movable in two coordinate directions” between a feed device and a substrate. An exemplary, non-limiting embodiment of this feature will be appreciated with reference to Figs. 1 and 2. As shown in Fig. 1, the head 1 is positioned above a feed device, which is in the form of a component tape 2. And in Fig. 2, the head 1 is positioned above a substrate 13. The head 1 may be moved in two coordinate directions (e.g., the X and Y directions schematically illustrated in Fig. 1) between the feed device (as shown in Fig. 1) and a substrate (as shown in Fig. 2).<sup>1</sup> The “two coordinate directions” feature (as recited in independent claims 19 and 37), in combination with the other features defined by claims 19 and 37, is not taught or suggested by the prior art relied upon by the Examiner.

With reference to Figs. 3 and 4 of Seno, the disclosed apparatus includes a parts feed device 7 fixed to a base stand 1, an XY table adapted to move a substrate in the lateral and longitudinal directions, and a parts mounting head 6 fixed to a head frame 29 of the base stand 1. During operation, the parts mounting head 6 picks up parts 8 at the feed device 7, rotates to a substrate 2 positioned on the XY table, and places the parts 8 thereon. The positioning of the substrate 2 is performed by the XY table.

Seno’s mounting head 6 is movable to the extent that it rotates relative to the head frame 29. However, the mounting head 6 does not move in two coordinate directions as required by independent claims 19 and 37. In fact, as

---

<sup>1</sup> Spec., page 5, lines 7-9.

Fig. 8 clearly shows, the mounting head 6 includes a frame 24 that is secured on a main shaft 27, which extends through a housing 30 bolted to the underside of the head frame 29. This structure necessarily prevents the mounting head 6 from moving in coordinate directions as required by independent claims 19 and 37. Moreover, the feed device 7 is not part of the mounting head 6, but is instead separately disposed on the base stand 1.

Turning to the next point, and with reference to Fig. 6 of Seno, the mounting head 6 includes a plurality of chucks 9 for holding the parts 8. The Examiner compares the chucks 9 to the head of the present invention. This is simply incorrect, however, at least because the chucks 9 are separate and distinct elements from the parts feed cassettes 22 (compared by the Examiner to the claimed storage element). Indeed, Fig. 9 depicts the constituent elements of each chuck 9. Fig. 9 is discussed in detail beginning at col. 8 (lines 14+) of the Seno reference. Fig. 9 and the corresponding description thereof do not indicate that the parts feed cassettes 22 are constituent elements of the chucks 9. The Examiner's assertions to the contrary are tenable only by placing a strained interpretation on the reference.

For these reasons, Applicants respectfully assert that independent claims 19 and 37 are patentable and that claims 20-24, 26-36 and 38-43 are patentable at least by virtue of their dependencies.

Amendment Under 37 C.F.R. § 1.111  
U.S. Appln. No. 09/913,311  
Attorney Docket No. 32860-000234/US

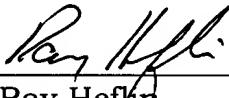
**CONCLUSION**

If any matters remain at issue in the application, the Examiner is invited to contact the undersigned at (703) 668-8000 in the Northern Virginia area, for the purpose of a telephonic interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY & PIERCE, P.L.C.

By   
Ray Heflin  
Reg. No. 41,060

P.O. Box 8910  
Reston, VA 20195  
(703) 668-8000

DJD/HRH:ewd

Attachment: New Abstract of the Disclosure